Date: 1/2/07

IN WITNESS WHEREOF, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:	FOR THE RANDOM HOUSE DEFENDANTS
James Frey	D.L.
	Robert Sorrentino
1/2/2	Senior Vice President, Taxes, Random House, Inc.
Date: 1/2/07	Date:
James Frey	Robert Sorrentino
Big Jim Industries, Inc.	President, Doubleday & Company, Inc.
Date: 1/2/07	
	Date:
12Rha	
Maya Frey	
, , , , , , , , , , , , , , , , , , , ,	Robert Sorrentino
	Vice President, Taxes, Random House VG, Inc.
Date: 1/2/07	
Date: 1/2/0/	Date:
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- Rent of herry	
Derek J. Meyer	Mark B. Blocker
McDermott Will & Emery LLP	Sidley Austin LLP
227 West Monroe Street, Suite 4400	One South Dearborn
Chicago, Illinois 60606	Chicago, Illinois 60603
Attorney for the Frey Defendants	Attorney for the Random House Defendants
.1	= yourums

Date:____

IN WITNESS WHEREOF, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:	FOR THE RANDOM HOUSE DEFENDANTS
James Frey	Robert Sorregano Senior Vice President, Taxes, Random House, Inc.
Date:	Date: 12/15/06
James Frey Big Jim Industries, Inc.	President, Doubleday & Company, Inc.
Date:	Date: 12/15/06
Maya Frey	Robert Sorrentino Vice President, Taxes, Random House VG, Inc.
Date:	Mark B Blocker
Derek J. Meyer McDermott Will & Emery LLP 227 West Monroe Street, Suite 4400 Chicago, Illinois 60606 Attorney for the Frey Defendants	Mark B. Blocker Sidley Austin LLP One South Dearborn Chicago, Illinois 60603 Attorney for the Random House Defendants
Date:	Date: 12/28/2006

FOR THE PLAINTIFFS:

Plaintiff Marolo Vedral	Michele Snow
Larry D. Drury I.dd. 205 W. Randolph Street. Suite 1430 Chicago. Himois 60606 Proposed Co-Leud Class Counsel Attorney for Plaintiff Mercia Vedral	Evan J. Smith. Esquire Brodsky & Smith. LLC Two Bala Plana, Suite 602 Bala Cynwyd, PA 19004 (610) 667-6200 Proposed Co-Load Class Comsel Attorney for Plaintiff Michele Snow
Date: 12-6-06	Date: 12-6-06
Plaintiff Jennifer Colui Date:	Plaintiff Atm Marie Strack Date:
Thomas Mulianey 708 Third Avenue, Suite 2500 New York, New York 10017 Phone: (212) 223-0800 Liuisan Cluss Counsel Attorneys for Plaintiff Jennifer Cohn	Thomas A. Ziminerman, Jr. Ziminerman and Associates, P.C. 100 West Monroe Street, Suite 1300 Chicago, Illinois, 60603 Attorney or Plaintiff Ann Marie Streek
Date:	Date:

FOR THE PLAINTIFFS:

Plaintiff Marcia Vedral	Plaintiff Michele Snow
Date:	Date:
Larry D. Drury Larry D. Drury Ltd. 205 W. Randolph Street, Suite 1430 Chicago, Illinois 60606 Proposed Co-Lead Class Counsel Attorney for Plaintiff Marcia Vedral	Evan J. Smith, Esquire Brodsky & Smith, LLC Two Bala Plaza, Suite 602 Bala Cynwyd, PA 19004 (610) 667-6200 Proposed Co- Lead Class Counsel Attorney for Plaintiff Michele Snow
Date:	Date:
Plaintiff Diane Marolda Date: 12/1/00	Plaintiff Ann Marie Strack Date:
Thomas Mullaney 708 Third Avenue, Suite 2500 New York, New York 10017 Phone: (212) 223-0800 Liaison Class Counsel Attorneys for Plaintiff Diane Marolda	Thomas A. Zimmerman, Jr. Zimmerman and Associates, P.C. 100 West Monroe Street, Suite 1300 Chicago, Illinois 60603 Attorney or Plaintiff Ann Marie Strack
Date: 12-5-2004	Date:

FOR THE PLAINTIFFS:

Date:
Evan J. Smith, Esquire
Brodsky & Smith, LLC
Two Bala Plaza, Suite 602
Bala Cynwyd, PA 19004
(610) 667-6200
Proposed Co- Lead Class Counsel
Attorney for Plaintiff Michele Snow
Date:
Plaintiff Ann Marie Strack
Date: 12-8-06
That I do
Thomas A. Zimmerman, Jr.
Zimmerman and Associates, P.C.
100 West Monroe Street, Suite 1300
Chicago, Illinois 60603
Attorney or Plaintiff Ann Marie Strack
Date: 12-11-2006

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Plaint I Jimmy Gloyd	Plaintiff Jill Giles
Day 1/4/07 / // C	Date:
Alan S. Ripka Napoli Bern Ripka LLP 115 Broadway New York, New York 10006 Attorney for Plaintiff Jimmy Floyd	Alan J. Statman Colleen M. Hegge (of counsel) 2900 Chemed Center 255 East Fifth Street Cincinnati. Ohio 45202 Attorneys for Plaintiff Jill Giles
Date: December 5, 2006	Date:
Plaintiff Pilar More	Plaintiff Shera Paglinawan
Date:	Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	Michael David Myers Myers & Company, P.L.L.C. 1809 Seventh Avenue, Suite 700 Seattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan
Date:	Date:
Plaintiff Sara Brackenrich Date:	
Vincent L. DiTommaso DiTommaso & Lubin, PC 17W 220 22nd Street, Suite 200 Oakbrook Terrance, Illinois 61081 Attorney for Plaintiff Sara Brackenrich	

Date:_

Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	Date:
Alan S. Ripka Napoli Bern Ripka LLP 115 Broadway New York, New York 10006 Attorney for Plaintiff Jimmy Floyd	Alan J. Statman Colleen M. Hegge (of counsel) 2900 Chemed Center 255 East Fifth Street Cincinnati, Ohio 45202 Attorneys for Plaintiff Jill Giles
Date: 11/29/06	Date:
Plaintiff Pilar More Date: 11 / 29/06	Plaintiff Shera Paglinawan Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More Date:	Michael David Myers Myers & Company, P.L.L.C. 1809 Seventh Avenue, Suite 700 Seattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan Date:
Plaintiff Sara Brackenrich	
Vincent L. DiTommaso DiTommaso & Lubin, PC 17W 220 22nd Street, Suite 200 Dakbrook Terrance, Illinois 61081 Attorney for Plaintiff Sara Brackenrich Date:	

Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	Date:
Alan S. Ripka	Alan J. Statman
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115 Broadway	2900 Chemed Center
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	Auorneys for Plaintiff Jill Giles
Date:	Date:
Plaintiff Pilar More	Plaintiff Shera Paglinawan
Date:	Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	Plaintiff Wendy Shaw Date:
Date:	Michael David Myers
S. P. C.	Myers & Company, P.L.L.C.
	1809 Seventh Avenue, Suite 700
	Seattle, Washington 98101
	Attorney for Plaintiff Shera Paglinawan
C P,	Date:
Plaint F Sara Brackenrich	
Date: 20 Nov. 06	
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Plaintiff Jimmy Floyd	Maintiff Jill Giles
Date:	Date: 12-7-0 6
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Alan S. Ripke	Alan Statman
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115 Broadway	2900 Chemed Center
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	Attorneys for Plaintiff Jill Giles
Date:	Date: 12-7-04
Plaintiff Pilar More	Plaintiff Shera Paglinawan
Date:	Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	Michael David Myers Myers & Company, P.L.L.C 1809 Seventh Avenue, Suite 700 Seattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan
Date:	Date:
Plaintiff Sara Brackenrich	•
Date:	
Vincent L. DiTommaso	•
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Oakbrook Terrance, Illinois 61081	
Attorney for Plaintiff Sara Brackenrich	
Date:	

Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	The Giles
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ontany Pioya	Cincinnati, Ohio 45202
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Date:	Attorneys for Plaintiff Jill Giles
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Plaintiff Pilar More	Alle Doung
D	Plaintiff Shera Paglinawan
Date:	
	Date: 3 Dec. 2002
Thomas E. Pakenas	
Dale and Pakenas	Plaintiff Wendy Shaw
641 W. Lake Street, Suite 400	welldy Shaw
Chicago, Illinois 60661	Date:
Attorneys for Plaints 90001	Date,
Attorneys for Plaintiff Pilar More	4 . 1
Date:	1 1/1 1/
Date:	Michael David Myers
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	Myers & Company, PLL.C.
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	Statile, Washington Dates
	Attorney for Plaintiff Shera Paglinawan
	Date: 12 . 3 . 2006
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aintiff Sara Brackenrich	
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Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	Date:
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Date:	Date:
Plaintiff Pilar More	
	Plaintiff Shera Paglinawan
Date:	Date:
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Thomas E. Pakenas	Plaintiff Wondy Shaw
Dale and Pakenas	-2/9
541 W. Lake Street, Suite 400 Chicago, Illinois 60661	Date: 2/06
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Date:	VI
Homographic Commission	Michael David Myers
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	Assures for Platniff Shera Paglinawan
	Date:
Plaintiff Sara Brackenrich	
Pate:	
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